

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,	)	CIVIL NO.04-00502 DAE BMK
a Hawai'i, nonprofit corporation;	)	
NA IMI PONO, a Hawaii	)	DECLARATION OF MAJOR
unincorporated association; and	)	GENERAL WILLIAM H.
KIPUKA, a Hawai'i unincorporated	)	BRANDENBURG
association,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
DONALD H. RUMSFELD, Secretary of	)	
United States Department of	)	Hearing:
Defense; and LES BROWNLEE, Acting	)	
Secretary of the United States	)	Date: November 20,2006
Department of the Army,	)	Time: 9:45
	)	Judge: Hon. David A. Ezra
Defendants.	)	

I, Major General William H. Brandenburg, hereby declare  
that:

1. I am currently the Commanding General, 8<sup>th</sup> Theater  
Sustainment Command and Commanding General, United States Army  
Hawaii. I am responsible to ensure that 2<sup>nd</sup> Brigade, 25<sup>th</sup>  
Infantry Division (2/25) is trained to standard as a Stryker  
Brigade Combat Team (SBCT). I ensure that the Brigade has the  
time, facilities, personnel, equipment, and training resources  
in Hawaii to meet their initial operating capability by November  
2007. The Brigade must be available on time to meet the needs  
of Commander, United States Pacific Command and global

commitments. Any delay or training that is not to standard places Soldiers at extreme risk. Not well understood is that the Stryker Brigade is equipped with weapons that are standard and common in all Army units and that have been in use at Schofield Barracks and Pohakuloa Training Area (PTA) for over 20 years. In some cases the weapons have been in use for over 50 years. Weapons and the caliber of ammunition are not Stryker-unique. Additionally, the range construction is not new but is a modernization of ranges on existing facilities with the same impact areas. In every case the Army has taken unprecedented, extraordinary measures to protect the environment and cultural sites. The mitigation measures are in place and will be continued.

2. I am a career Infantry Officer with over 33 years of service. I have commanded at the Company, Battalion and Brigade level during my service in the United States Army and have served as a Staff Officer at multiple echelons, ranging from Battalion through Geographic Combatant Command. Significant operations I have participated in include: DESERT THUNDER, where as Commander of 1<sup>st</sup> Brigade, 3<sup>rd</sup> Infantry Division I deployed the Brigade to defend Kuwait from Iraqi aggression; DESERT FOX, where as Chief of Staff for V Corps I led the planning for the deployment of critical air defense capabilities into the Middle East; JOINT FORGE, where I served as the Allied

Command Europe Rapid Reaction Corps Deputy Chief of Staff for Operations, planning and executing the NATO entry and initial operations in Kosovo; and OPERATION IRAQI FREEDOM, where I served for a year as Deputy Commanding General, Multi-National Force - Iraq and Commanding General, Task Force 134. Prior to being stationed in Hawaii, I served as the Deputy Commanding General of I (US) Corps and Fort Lewis, Washington. In this role I was directly responsible for the establishment of the first two SBCTs in the Army inventory. Given my previous responsibilities at Fort Lewis and my current duties, I am intimately familiar with the training requirements and training resources in Hawaii required to deploy a Stryker Brigade to combat.

3. The US Army has established both general and specific training requirements and standards for individuals and units deploying to combat. This is the case with OPERATION IRAQI FREEDOM, where the U.S. commander of all land forces, in conjunction with the U.S. Army, has established specific training requirements and events that must be accomplished to high performance standards before a unit is ready to deploy to combat in Iraq. These training requirements are the direct result of the combat conditions that exist in Iraq. They have been modified as the enemy situation changes. Failure to train to standard prior to deploying to combat directly results in

less effective units, degraded operations, and higher Soldier casualties.

4. The 2/25 SBCT is scheduled to be ready for deployment in November 2007. The brigade is currently executing its training plan and is integrating its new SBCT systems. The brigade is approximately 60% thru its training as a SBCT.

5. The 2/25 SBCT training plan includes progressive training of individual Soldiers up to collective unit training of each echelon within the brigade - from squad level through platoon, company, battalion, and ultimately the entire SBCT. Individual training consists of Soldiers tasks, equipment and weapons training, weapons qualification and advanced marksmanship. Unit or collective training consists of tactical situational and field training exercises (STX and FTX) at squad, platoon, company, battalion, and brigade levels, and collective live-fire maneuver exercises (LFX) at squad, platoon, and company. These STX, FTX, and LFX are done with Stryker vehicles for both mounted and dismounted operations. Specific essential training for 2/25 SBCT at Schofield Barracks and PTA include Stryker Vehicle New Equipment Training (known as OPNET, consisting of Stryker operations, employment and maintenance), command and control systems training, basic and advanced medical training, basic and advanced marksmanship training, qualification for all weapons, squad and platoon STX and LFX, company STX and FTX, and



Stryker Mounted Gun System (MGS) OPNET and gunnery/qualification.

6. In order to conduct the essential training which is required, both to go to war and transform the brigade, the 2/25 SBCT needs essential ranges and training lands and must also be supported by some key facilities. On Schofield Barracks and East Range Area, the essential ranges, training lands, and facilities include all previously approved existing ranges and training areas that have been in use for years and are not a part of the Stryker Environmental Impact Statement (EIS). These are ranges that all units routinely use for training. These include the CR and KR series ranges, the Military Operations on Urbanized Terrain (MOUT) site, the MOUT Shoot House and the non-live fire training areas on Schofield Barracks and East Range areas. The training areas on Oahu provide essential close terrain and Jungle like conditions for preparation for the SBCT for world wide deployments. There are numerous countries in the Asia-Pacific region that require familiarity with dense vegetation and steep terrain. Oahu is the only training area that offers Army units a Jungle like experience. Additionally, PTA offers terrain that is not dissimilar to terrain found in Afghanistan. One reason Hawaii was chosen as a location for the SBCT was the variety of terrain and climatic conditions in Hawaii.

7. Among the Stryker EIS projects on Schofield Barracks, it is essential that the SBCT train and fire on qualification training range 1 (QTR 1). This is the only machine gun qualification range on Schofield Barracks. It is an improved range facility, built upon existing ranges, where the weapon systems common to all Army units have been and are fired. The 2/25 SBCT will not fire any weapons on QTR 1 that are unique only to Stryker. They will fire the same weapons with or without Strykers. The only unique aspect of the SBCT is that they fire the same weapons from a stationary Stryker vehicle versus from a stationary HMWV-type vehicle, or from a ground mounted configuration. QTR 1 supports individual weapons qualification through crew-served weapons. As it replaced the former machine-gun and individual weapon ranges it is built on, there is no other Army standard machine gun range on Schofield. Shutting down QTR 1 would cause significant harm to 2/25 SBCT training, prevent weapons qualification, and reduce capability and readiness of Soldiers to deploy to combat. In addition, QTR 1 is not a SBCT-unique range, and its closure would negatively impact all units in Hawaii. The modernization of the ranges is required to facilitate improved optics of our weapons and provide feedback with a dynamic, computerized target system.

8. The caliber of weapons used by the 2/25 SBCT in Hawaii are the same as any unit in the U.S. Army. They include the 9mm pistol, the M16 rifle (5.56mm), the M4 rifle (5.56mm), the M249 Squad Automatic Weapon (5.56mm), the M240 Machine Gun (7.62mm), the M2 .50 Caliber Machine, the MK 19 Machine Gun (40mm), and the 60mm, 81mm and 120mm mortars. The only weapons system which is a unique Stryker capability is the 105mm Mobile Gun System, which is a 105mm gun that is mounted on the Stryker vehicle. While the system is new, firing 105mm shells is not; they have been fired by 105mm Artillery Guns, and tanks, for years at PTA. When the MK 19 Machine Gun is fired on QTR 1, it utilizes training munitions (non-high explosive and inert), as opposed to service munitions (high explosives), and therefore does not pose adverse environmental effects.

9. The uniqueness of the Stryker Brigade does not lie in its associated weapons systems but rather in the Stryker's ability to provide enhanced situational awareness for command and control through computerized systems located in the vehicle, increased protection to Soldiers in the vehicle, and the increased speed of movement. The weapons systems are lethal because the Stryker has the capability to integrate sensors in order to ascertain the precise location of the target.

10. Another important facility is the Urban Assault Course. It is difficult for Soldiers and small units to attain and sustain

skills in close quarters and urban operations (similar to those conducted in Iraq daily). Soldiers must be thoroughly trained in those skills to minimize the possibility of friendly and non-combatant casualties.

11. PTA and Kahuku Training Area (KTA) vehicle wash racks, while not training facilities, are projects planned for construction in summer 2007 that support all military vehicles. Vehicle wash racks will limit environmental damage, prevent migration of noxious weed species and enable good land stewardship. In addition, these wash racks will enable safer conditions for military vehicle operations.

12. Additionally, completion of the maintenance facility currently under construction, to be finished in September 2007, is necessary. This facility provides the space required for the SBCT. The SBCT is currently using space required for 25<sup>th</sup> Infantry Division units returning from Iraq.

13. Also essential to support the required maneuver training of 2/25 SBCT are all of the previously approved existing ranges and training areas at PTA on the Island of Hawaii. These ranges have been in use for years, and all units routinely train there. Specifically, this includes range 11T, a former tank gunnery range which is being modified into an improved range to support Stryker MGS Gunnery and Weapons Qualification. This existing range is not a part of the Stryker EIS, but is essential to the



SBCT's training for combat. The Stryker MGS fires the same 105mm ammunition that tanks previously shot on range 11T.

14. Enjoining the construction and training of the SBCT will negatively impact all units in Hawaii. These ranges not only support the transformation of the 2/25 SBCT, but also support the training of returning combat forces currently deployed once they return, reset and retrain, as well as both active and reserve component Army forces and the Hawaii National Guard forces remaining in Hawaii. These ranges and training facilities are also available and are used by other military services.

15. There are no opportunities to temporarily relocate to and train at Fort Lewis, Washington or Alaska. There is already significant competition for training space at Fort Lewis, Washington due to the number of units on that installation. While one of the SBCTs is currently deployed, there are two others: one that is training and a new one that is also being established. In Alaska, there is also very limited training space. This is compounded by the fact that the 172<sup>nd</sup> SBCT will be redeploying back to Alaska by December 2006 and will commence its reset and training in preparation for follow on operations in support of the Global War on Terror. In addition, Alaska requires vehicles and equipment be winterized for daily operations. 2/25 SBCT is not winterized nor does the time

available provide for this additional requirement. A temporary relocation of the 2/25 SBCT outside of Hawaii will also result in unprogrammed costs being levied on the U.S. Army. Most importantly, it will result in additional hardships on Soldiers and their families through prolonged separations resulting from additional time required to train outside of Hawaii.

16. Without the ability to continue to train according to its plan and to utilize the ranges and training areas described previously, 2/25 SBCT will not be prepared, trained, nor ready to deploy to Iraq. Enjoining Stryker activities in Hawaii, for any amount of time, will cause irreparable harm to our Army and place unnecessary risk on our sons and daughters who have volunteered to serve.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

William H. Brandenburg      13 Nov 06

MAJOR GENERAL WILLIAM H. BRANDENBURG

Date